

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
GREENVILLE DIVISION

IN RE:

GORDAN S. ROYLANCE  
ROBIN M. ROYLANCE  
1021 CROSSWINDS DRIVE  
ELIZABETH CITY, NC 27909

CHAPTER 13  
CASE NO. 07-02973-8-RDD

SSN.: xxx-xx-2692  
xxx-xx-3110

DEBTORS

RESPONSE TO MOTION FOR RELIEF FROM STAY  
OR ADEQUATE PROTECTON

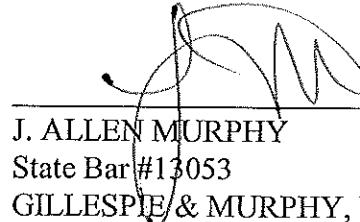
NOW COME the Debtors, by and through their undersigned counsel, and respond to the Motion for Relief from Stay or Adequate Protection filed by Wells Fargo Bank, N.A. ("Movant") and show unto the Court as follows:

FIRST DEFENSE

1. Paragraph one (1) is admitted.
2. Paragraph two (2) is admitted.
3. Paragraph three (3) is admitted.
4. Paragraph four (4) is admitted.
5. Paragraph five (5) is denied.
6. With regard to the allegations of paragraph six (6) it is admitted that the value of Property was \$160,000.00 in the year 2007 and there was a second mortgage against the Property in favor of Countrywide Mortgage in the approximate amount of \$42,100.00. Except as admitted herein, the debtor does not have sufficient information or knowledge to form a belief as to the truthfulness of the remaining allegations of paragraph six (6) and therefore the same are denied.
7. Paragraph seven (7) is denied.

WHEREFORE, the Debtors respectfully pray of the Court that the Motion for Relief from Stay or Adequate Protection filed by Wells Fargo Bank, N.A. be denied and this matter be set for hearing.

This the 18<sup>th</sup> day of July, 2011.



J. ALLEN MURPHY  
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CERTIFICATE OF SERVICE

I, , Attorney at Law certify:

That I am, and at all time hereinafter mentioned was, more than 18 years of age.

That on the 18<sup>th</sup> day of July, 2011, copies of the foregoing were served upon the following by depositing the same in the United States mail, postage pre-paid, addressed as follows or by electronic notification:

Richard M. Stearns  
Chapter 13 Trustee  
PO BOX 2218  
Kinston, NC 28502

Christine M. Lamb  
The Lamb Firm  
PO BOX 2188  
Davidson, NC 28036-2188

Gordan & Robin Roylance  
1021 Crosswinds Drive  
Elizabeth City, NC 27909

I certify under penalty of perjury that the foregoing is true and correct.

DATED: 7-18, 2011.

J. Allen Murphy